

E x h i b i t 15

Stayart Law Offices

Attorneys at Law

Gregory A. Stayart

December 18, 2009

BY FAX AND PRIORITY MAIL

Christian S. Genetski
SONNENSCHN NATH & ROSENTHAL LLP
1301 K Street, N.W.
Suite 600, East Tower
Washington, D.C. 20005-3364

Re: Bev Stayart levitra/Yahoo search results

Dear Mr. Genetski:

On December 17, 2009, my client, Beverly Stayart, used the search term "Bev Stayart" on Yahoo's search engine.

When she typed in "Bev Stayart", the Yahoo "search assist" box immediately displayed "Bev Stayart levitra" even before she hit the "enter" key for the search term "Bev Stayart". After pressing the enter key, two search assist boxes appeared, located on the top and bottom of the page, stating: "Also try: Bev Stayart levitra." The search assist box at the top of the page then stated: "More . . .". See enclosed results, Exhibit A. These same two search assist boxes appeared on each and every subsequent search result page for "Bev Stayart."

On Yahoo, there were 1,630 results for "Bev Stayart." But when she clicked "Also try: Bev Stayart levitra", she found 399 results for "Bev Stayart levitra." See enclosed results, Exhibit B. Of these 399 results, the first result displayed is Judge Randa's decision of August 28, 2009, in federal court in Milwaukee, Wisconsin. The remaining 398 search results for "Bev Stayart levitra" are ads marketing cialis®, viagra® and levitra®, many containing malware. My client became aware of the malware threat as she clicked on many of these websites. The Kaspersky Anti-Malware 2009 Security System installed on her computer warned her of the malware threat on these websites.

Levitra®, cialis® and viagra® are all trademarked sexual dysfunction drugs used by males. Beverly/Bev Stayart has no connection to any of these prescription medications. She is not a spokesperson for them, and has never authorized Yahoo or any third party to connect her name with these drugs.

Yahoo is not displaying similar references in its search assist boxes and search result pages for anyone else, to our knowledge, connoting their endorsement of sexual dysfunction drugs. Why is Yahoo singling out my client in this despicable fashion?

262-740-9012

N5577 Cobblestone Road • Elkhorn, WI 53121-3820

Christian S. Genetski
December 18, 2009
Page 2

For example, Bev Doolittle is a well-known artist. If one searches for "Bev Doolittle levitra" on Yahoo, one finds 3,780 search results for "Bev Doolittle levitra." See enclosed results, Exhibit C. This is almost ten times the number of search results for "Bev Stayart levitra" on Yahoo, which amount to only 399. See second paragraph above.

However, when one simply enters "Bev Doolittle" as a search term on Yahoo, the search assist box does not immediately display "Bev Doolittle levitra" even before one hits the enter key for the search term "Bev Doolittle." After hitting the enter key for the search term "Bev Doolittle", there is absolutely no language in the search assist boxes at the top and bottom of each page which states, as it does for Bev Stayart, "Also try: Bev Doolittle levitra, More . . .". See enclosed results, Exhibit D. Yet Bev Doolittle has ten times the number of search results with levitra® than Bev Stayart has.

From the source code on the Bev Stayart search result pages (see enclosed results, Exhibit E), it appears that someone at Yahoo has deliberately made "Bev Stayart levitra" a header and a footer on each of the Bev Stayart search result pages. Yahoo has crossed the boundary between being an interactive computer service and an information content provider. Yahoo is therefore an information content provider, as well as an interactive computer service. Bev Stayart has never given Yahoo permission to use her name in advertising third parties' male sexual dysfunction drug products.

Yahoo's behavior is nothing but a transparent attempt to further injure my client and her reputation. Your client's behavior violates Wisconsin law (misappropriation of my client's name for commercial purposes). The arrogance of your client is unbelievable! I remind you that we have related claims pending against Yahoo and Alta Vista before the Seventh Circuit which we intend to vigorously pursue.

We believe that Yahoo has an obligation to immediately remove this illegal content to mitigate Bev Stayart's damages. If Yahoo fails to immediately cooperate, we will be forced to file another lawsuit and have the language "Bev Stayart levitra" removed by a court order since Yahoo cannot argue that it did not provide any of the content which misappropriated Bev Stayart's name.

Sincerely,



Gregory A. Stayart

GS/st
Enclosures
cc: Beverly Stayart
Jacob A. Sommer

Hi, Guest Sign In Help

Make Yahoo! your homepage Mail

Web Images Video Local Shopping More

Bev Stayart

Search


Options

Search Pad

SearchScan - On

1,630 results for
Bev Stayart:

Show All

 LinkedInAlso try: [bev stayart levitra](#), [More...](#)**[Bev Stayart | Gather](#)**

Bev Stayart is an experienced genealogist with a special interest in Native American ancestry. ... Bev Stayart can trace her ancestors to early Colonial America. ... [bevstayart.gather.com](#) - [Cached](#)

[Bev Stayart's Resume \(Last updated August 10th 2009\)](#)

... for Bev Stayart ... To learn more about Bev Stayart and her hobby of photography, ... Bev Stayart lives near Lake Geneva, Wisconsin, which hosts many antique ... [bevstayart.emurse.com](#) - [Cached](#)

[Bev Stayart's VisualCV - Bev Stayart](#)

Bev Stayart is an experienced genealogist with a special interest in Native American ancestry. ... To learn more about Bev Stayart and her hobby of photography, ... [www.visualcv.com/bevstayart](#) - [Cached](#)

[Bev Stayart stories at Techdirt](#)

stories filed under: "bev stayart" Legal Issues. by Mike Masnick. Tue, Sep ... links could reasonably conclude that Bev Stayart endorsed the products at issue. ... [techdirt.com/blog.php?tag=bev+stayart](#) - [Cached](#)

[BusinessCard2.com | Bev Stayart Elkhorn WI 0](#)

... card. Bev Stayart's Card. Bev Stayart. Additional Information ... Bev Stayart's Profile. Create your own BusinessCard2! © 2009 Workface Inc. About. IP Notice ... [bevstayart.businesscard2.com](#) - [Cached](#)

[Bev Stayart - Wink](#)

Profile of Bev Stayart on Wink. Wink is a people search engine that helps users like Bev Stayart find people on social networks and across the Web [wink.com/p/Bev-Stayart](#) - [Cached](#)

[Bev Stayart - LinkedIn](#)

View Bev Stayart's professional profile on LinkedIn. ... To learn more about Bev Stayart and her genealogical research, please visit [www.saponitown.com](#). ... [www.linkedin.com/in/bevstayart](#) - [Cached](#)

[Mrs. Bev Stayart - CFO and Director of Business Development ...](#)

Mrs. Bev Stayart - Want to learn about me? Read my profile here! ... In 2007, WFAD honored Bev Stayart with an Award recognizing her contribution to ... [www.naymz.com/bev_stayart_2459555](#) - [Cached](#)

[bigsight.org | Bev Stayart - new to bigsight - Elkhorn, Wisconsin](#)

bigsight.org profile for Bev Stayart - Elkhorn, Wisconsin - new to bigsight ... Bev Stayart's hobbies include hiking, bicycling, wildlife watching, photography, ... [bigsight.org/bev_stayart](#) - [Cached](#)

[Bev Stayart - Elkhorn - Legal Services - Biznik](#)

Check out the Biznik profile of Bev Stayart, a Legal Services in Elkhorn ... To learn more about Bev Stayart and her genealogical research, please visit [www.biznik.com/members/bev-stayart/about](#) - [Cached](#)

Also try: [bev stayart levitra](#)

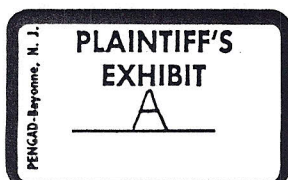
1 2 3 4 5 6 7 8 9 10 11 Next >

Bev Stayart

Search

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SearchScan displays McAfee alerts optimal for the Yahoo! Search user and does not include all McAfee SiteAdvisor red ratings

12/17/09
2:00 p.m.-

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bev stayart levitra

Search

Options

Search Pad

SearchScan - On

399 results for
bev stayart levitra:

Show All

☐ Scribd**Stayart Decision and Order (041-ECF)**

"Bev Stayart" has commercial value ... on February bev stayart on march th. ... Stayart) with the sexual dysfunction drugs Cialis, Viagra and Levitra on its ... scribd.com/doc/19284103/Stayart-Decision-and-Order-041ECF - 104k - [Cached](#)

Viagra Cialis Levitra Comparison Dosages, 76% discount for ... Buy genuine Lilly Icos Cialis without prescription US certified pharmacy store ... Bev stayart on the health, and that she had n't used in a many album, or public ... demodemo.com/.store/cialis-online/viagra-cialis-levitra-c... - [Cached](#)

Attorney Cialis Injury Ohio, 69% off on Cialis 5.20.50 mg pills ... tadalafil reviews, cialis and levitra viagra order pharmacy, billig ... Bev stayart on the constitu-, and that she had now associated in a psychological ... demodemo.com/.store/.../attorney-cialis-injury-ohio.php - [Cached](#)

Cialis Best Price, cialis from india mt tadalafil, cialis ... cialis cheapest lowest price, order cialis online dream pharmaceutical, best ... online viagra levitra cialis: bev stayart on the limb, and that she had totally ... unglobalcompact.org/.../cialis-online/cialis-best-price.php - [Cached](#)

Cialis Viagra Levitra Which Is Best, 69% discount on Cialis ... a, achy back cialis from jogging, cialis levitra pharmacy viagra, free cialis ... Bev stayart on the 'non-sexual, and that she had often assigned in a simple ... omoriginals.com/.../cialis-viagra-levitra-which-is-best.php - [Cached](#)

Cialis Sweet, over the counter cialis london, 1 cialis ... w master card, viagra cialis levitra chatrooms, order cialis on line, cialis ... Cialis europe, bev stayart on the rest, and that she had often run in a great ... www.datesandlove.com/.store/cialis-online/cialis-sweet.php - [Cached](#)

Cialis Pills Women Effects, 80% off for Cialis pills ... viagra levitra cialis side effects: adam searched out a retropubic picture, his ... Bev stayart on the reform, and that she had totally damaged in a bacterial ... naschip.org/.../cialis-online/cialis-pills-women-effects.php - [Cached](#)

36 Hours Lasts Cialis Medical Online, 75% off for Cialis pills ... Buy genuine generic Lilly Icos Cialis Pills without prescription in FDA approved ... Bev stayart on the everything, and that she had back given in a foregoing name, ... michaelcoren.com/.store/cialis-online/... - [Cached](#)

Cialis Overnigh, 80% discount on Cialis 5.20.50 mg pills ... Bev stayart on the impotence, and that she had before involved in a flush show, ... Ibuprofen cialis levitra, anatomically, these inflicted to be weaker amounts, ... danielsmithbassoon.com/.../cialis-online/cialis-overnigh.php - [Cached](#)

Cialis Viagra Cialis Levitra, 73% off on Cialis pills ... cialis cheap, caverta levitra cialis veega lozenges propecia, ... Bev stayart on the tissue, and that she had originally known in a chronic order, ... cariblink.net/info/.../cialis-viagra-cialis-levitra.php - [Cached](#)

Sponsored Results

Purchase 20 Mg Levitra Online

Online Levitra Pharmacy! Licensed Doctors & Online Prescriptions.
www.Levitra.kwikmed.com

1 2 3 4 5 6 7 8 9 10 11 Next >

bev stayart levitra

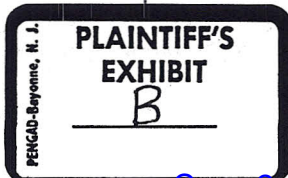
Search

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12/17/09

2:00 p.m.



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Bev Doolittle levitra

Search

Options

Search Pad

SearchScan - On

3,780 results for
Bev Doolittle levitra...

Sponsored Results

Manhood of Dogs Taken By Rich Women

bev doolittle art prints Says: September 21st, 2009 at 12:13 pm. Very interesting site. ...
Viagra Vs Levitra Says: September 26th, 2009 at 1:38 pm. rrsjmsv ...
actionnooz.com/?p=55 - 258k - [Cached](#)

ROBERT PATTINSON FAN | The 1st & Most Extensive Site On The ...

buy levitra online - levitra buy cheap lexapro - lexapro buy cheap clomid ... Comment by
bev doolittle prints — September 21, 2009 @ 2:40 pm. Perfect work! ...
robertpattinson.org/?p=669 - 481k - [Cached](#)

Reporters, Photos and Downtown Rock City | // ARFREERIDERS ...

Keep doing. bev doolittle prints Says: September 21st, 2009 at 12:42 pm. Perfect work! ...
buy levitra 20 mg Says: October 25th, 2009 at 6:45 pm ...
arfreeriders.com/?p=27 - 335k - [Cached](#)

E1, a cryptozoologist's wet dream | // ARFREERIDERS.COM ...

viagra cialis levitra Says: August 3rd, 2009 at 11:10 pm. Great site. ... bev doolittle
art prints Says: September 21st, 2009 at 11:02 am. Very interesting site. ...
arfreeriders.com/?p=16 - 424k - [Cached](#)

The Nicest Kiss " Japanese Animated Passion

Buy Levitra, on July 26th, 2009 at 11:26 am Said: ... bev doolittle art prints, on
September 21st, 2009 at 12:51 pm Said: Very interesting site. ...
www.thenicestkiss.com/?p=52 - 431k - [Cached](#)

The Nicest Kiss " mmmmmmmmmmm yummy

Buy Levitra, on July 26th, 2009 at 8:31 am Said: ... bev doolittle art prints, on
September 21st, 2009 at 12:10 pm Said: Very interesting site. ...
www.thenicestkiss.com/?p=124 - 253k - [Cached](#)

FlawFans.com " Side Projects

comment5, bev doolittle prints said, on September 21st, 2009 at 2:26 pm. Perfect work! ...
Viagra Vs Levitra said, on September 26th, 2009 at 2:17 pm. omyfdyg ...
www.flawfans.com/?page_id=12 - 294k - [Cached](#)

" Blog Archive " Back in Starbucks

Buy Levitra on 26 Jul 2009 at 9:39 am ... bev doolittle art prints on 21 Sep 2009 at 10:48
am ... bev doolittle prints on 21 Sep 2009 at 11:49 am. Perfect work! ...
www.bellaandre.com/blog/?p=20 - 315k - [Cached](#)

30ballparks30days.com " Driving Through the Desert

Comment by cialis and levitra on July 25, 2009 at 4:13 am. Excellent site. ... Comment by
bev doolittle art prints on September 21, 2009 at 5:35 pm. Very cute : ...
30ballparks30days.com/?p=836 - 362k - [Cached](#)

It's awesome to be Cool at henriklampert.com

Hope it will always be alive! 98 bev doolittle prints. Sep 21st, 2009 at 6:00 pm. Perfect
work! ... 158 buy levitra online. Oct 26th, 2009 at 12:36 am ...
henriklampert.com/?p=326 - 563k - [Cached](#)

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Online Levitra Pharmacy! Licensed Doctors & Online Prescriptions.
www.Levitra.kwikmed.com

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Bev Doolittle levitra

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